## Morrison Cohenue

Fred H. Perkins Partner (212) 735-8647 fhperkins@morrisoncohen.com

May 6, 2022

VIA ECF

Hon, John G. Koeltl United States District Judge United States Courthouse 500 Pearl St. New York, NY 10007-1312 1, Time & respond to the Complaint extended of 6/24/22. 2. The May 24, 2022 conference is Canceled. The parties should

Re:

Abreu v. Sant and Abel, LLC, 1:22-cv-01521-JGK

July 8, 2022, So prelied (45) 1.5.

Dear Judge Koeltl:

This firm is counsel to Defendant Sant and Abel, LLC in the above-referenced action: We write to request an extension of time to respond to the Complaint and to adjourn the initial 5/6/5 conference scheduled for May 24, 2022 at 4:30 p.m. by phone. The current due date to respond to the Complaint is May 9, 2022. The new proposed date to respond to the Complaint is June 24, 2022. This is the first request to adjourn the initial conference and the second request for an extension of time to respond to the Complaint, which prior request was granted. Plaintiff's counsel consents to this request. This extension is sought to provide the parties with additional time to explore potential amicable resolution of this matter. No Scheduling Order has been entered in this action and this request does not affect any other date.

Thank you.

Respectfully submitted,

Fred H. Perkins

Fred H. Perkins

FHP:gg

Plaintiff's counsel (via ECF) cc: